

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

MEREDITH BONIN, individually and on
behalf of all other persons similarly situated,

Plaintiffs,

AMICA MUTUAL INSURANCE
COMPANY,

Defendant.

Civil Action No. 17-cv-10434-ADB

**JOINT MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

Pursuant to Chapter 93A and Fed. R. Civ. P. 23, the Parties hereby move the Court for an order preliminarily approving the settlement of this class action, as reflected in the Stipulation Of Settlement (the “Settlement Agreement”) – a true and correct copy of which is attached as **Exhibit A** to the Memorandum in Support of the Joint Motion for Preliminary Approval of Class Action Settlement.

Specifically, the Parties seek an Order, substantially in the form attached as Exhibit 4 to the Stipulation of Settlement, (i) certifying a Settlement Class consisting of:

all persons (1) who brought a claim under a Subject Policy between December 30, 2008 and April 30, 2018, (2) who received at least \$2,000 in personal injury protection payments under the Subject Policy, and (3) the claim is identified as closed in Amica's records. Excluded from the Class are: all present or former officers and/or directors of Amica, Class Counsel and their resident relatives, Amica's counsel of record and their resident relatives, and the Judge in this case and their resident relatives.

(ii) preliminarily approving the negotiated class action settlement, (iii) appointing Plaintiff as representative of the Settlement Class, (iv) confirming the law firms of Connor & Morneau, LLP & Manelis & Beresen as Class Counsel, (v) approving a compensatory award in the amount of

\$5,000 for each Representative Plaintiff; (vi) awarding attorneys' fees and costs in amount of \$475,000; and (vii) directing the distribution of notice to the Settlement Class as provided in the Settlement Agreement.

As grounds for this Motion, Plaintiff respectfully refers the Court to her Memorandum in Support, which has been filed contemporaneously herewith.

Dated: May15, 2018

Plaintiff,
MEREDITH BONIN,

By her attorneys

/s/ Jeffrey S. Morneau

Jeffrey S. Morneau, BBO#643668
Connor, Morneau & Olin, LLP
273 State Street, 2nd Floor
Springfield, MA 01103
Telephone: (613) 455-1730
jmorneau@cmolawyers.com

/s/ Elliot Beresen

Elliot Beresen, BBO#038440
Manelis & Berensen
929 Worcester Rd.
Framingham, MA 01701
eberesen@gmail.com
Telephone: (508) 875-3833

Defendant,
AMICA MUTUAL INSURANCE
COMPANY,

By its attorneys,

/s/ Christopher M. Reilly

Anthony Antonellis, BBO#557964
Laura Meyer Gregory, BBO# 563689
Christopher M. Reilly, BBO# 674041
SLOANE and WALSH, LLP
3 Center Plaza, 8th Floor
Boston, MA 02108
Telephone: (617) 523-6010
Facsimile: (617) 227-0927
aantonellis@sloanewalsh.com
lgregory@sloanewalsh.com
creilly@sloanewalsh.com

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (“NEF”) and paper copies will be sent to those indicated as non-registered participants on the date of its filing.

/s/ Jeffrey S. Morneau_____
Jeffrey S. Morneau

LOCAL RULE 7.1 CERTIFICATION

Pursuant to Local Rule 7.1(A)(2), the undersigned counsel for Plaintiff hereby certifies that he communicated with counsel for Defendant by telephone and e-mail on numerous occasions and attempted in good faith to resolve or narrow the issues raised by this Motion. Defendant’s counsel has indicated that Defendant intends to join this Motion.

/s/ Jeffrey S. Morneau_____
Jeffrey S. Morneau